

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

ORIGINAL
RECEIVED

SEP 30 1991

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Part 74 of)
the Commission's Rules)
and Regulations with)
Regard to the Low Power)
Television Service)

RM-7772

To: The Commission

REPLY COMMENTS OF SHERJAN BROADCASTING COMPANY., INC.

Submitted herewith are reply comments of Sherjan
Broadcasting Co., Inc. with regard to the above-captioned
petition for rule making.

Service of these reply comments is hereby accepted on
behalf of the Community Broadcasters Association.

Respectfully submitted,


Peter Tannenwald

Arent, Fox, Kintner,
Plotkin & Kahn
1050 Connecticut Ave., N.W.
Washington, DC 20036-5339
(202) 857-6024

September 30, 1991

Counsel for Sherjan
Broadcasting Co., Inc.

049

television status would be given only to stations which elected to request it and which broadcast the local programming necessary to earn it.

3. The request for a power increase would have no impact on the secondary status of the service, window filings, or the lottery system for awarding licenses. Also, the freeze already in place in major markets would prevent community television stations from precluding new translators in markets where spectrum scarcity may be a problem. In other words, there is no real likelihood of any adverse impact on the translator industry.

4. Every advertiser looks at audience survey numbers when buying time, so that he knows what audience he will reach. A better call sign is seriously needed by LPTV stations that need to compete for a place in these surveys. LPTV stations and translators that want their present call signs can keep them. "Code keyer" station ID systems would not be affected.

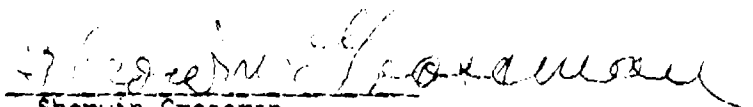
5. NTA actually supports the Petition in that it finds the goals to be "laudable." That is true. The goals are in the best tradition of American broadcasting history. But as the television industry has grown, the cost of building and operating a station has mushroomed to the point where programming production is now done mostly by the networks rather than local stations. But now a new industry is emerging with a new more modest economic base that

are in trouble and LPTV is blooming, then the segment that is blooming should be nurtured, especially when it is not at the expense of anyone else.

7. There is a strong record showing the need for CBA's proposals, and nothing compelling in the oppositions. Therefore, the Commission should proceed promptly to issue a Notice of Proposed Rule Making.

Respectfully submitted,
SHERJAN BROADCASTING
COMPANY, INC.

September 30, 1991


Sherwin Grossman
President

CERTIFICATE OF SERVICE

I, Lucy S. Colebaugh, do hereby certify that on September 30, 1991, I mailed copies of the foregoing Reply Comments of the Sherjan Broadcasting Company, Inc., by postage-paid, first-class United States mail, to the following:

William K. Rowell
3760 John Young Parkway
Suite 101
Orlando, FL 32804

Community Broadcasters
Association
P. O. Box 26736
Milwaukee, WI 53226

Hilding Larson
Matrix TV 15
615 Tank Farm Road
San Luis Obispo, CA 93401

Christopher T. York
David C. Solomon
C. Joyce Fenstermacher
TV50, Inc.
5215 Embassy Drive
Corpus Christi, TX 78411

Louis A. Zaroni
Azntech, Inc.
77 Shady Lane
Trenton, NJ 08619

Suzanne Chamberlain
W58AV - Channel 58
16 Agassiz Circle
Buffalo, New York 14214

John Schaller
TV45/Katy Communications
6110 Broadcast Parkway
Rockford, IL 61111

Lee Dolnick
WCTV, Inc.
332 W. Broadway, Suite 43
P. O. Box 2232
Waukesha, WI 53187-2232

Deepak Viswanath
TV36
11-D Jules Lane
New Brunswick, NJ 08901

Scott D. Miller
Station W18AN
Lincoln Memorial University
Cumberland Gap Parkway
Harrogate, TN 37752-0901

Andrew W. Knapp
W28AJ
Paging Associates, Inc.
24 Rockdale Road
West Haven, CT 06516

Frank H. Tyro
Salish Kootenai College
Box 117
Pablo, Montana 59855

Paul V. Engle
S. Jersey Television, Inc.
P. O. Box 888
Hammonton, NJ 08037

A. B. Herman
Port Services Company
6347 N. Marine Drive
Portland, OR 97203

Earl Marlar
W12BU/TV
P. O. Box 121
Heiskell, TN 37754

Ray Karpowicz
WBR-TV
115 Bell Tower Mall
Fort Myers, FL 33907

David C. Huot
Station W18AE
Killington Road
Killington, VT05751

Richard E. Koenig
Station K11SN-Channel 11
405 Business Loop 70 East
Columbia, MO 65201

W. S. Conley
C/TEC Corporation
P. O. Box 210046
Dallas, TX 75211

Glenn Shoemaker
Channel 17 K17CU
9454 Waples Street
San Diego, CA 92121

Ronald D. Kniffin
TV37 WAW
Hometown Vision, Inc.
184 Monroe Avenue
Rochester, NY 14607

Lanny R. Capps
VIP Channel 55
VIP, Inc.
511 W. 19th Street
Jasper, Alabama 35501

John D. Engelbrecht
S. Central Communications
Corp.
P. O. Box 3848
Evansville, Indiana 47736

J. Rodger Skinner, Jr.
TRA Communications
Consultants, Inc.
600 W. Hillsboro Blvd.
Suite 27 - 3rd Floor
Deerfield Beach, FL 33441

Sherwood H. Craig
Channel 17 UHF
P. O. Box 17
Brewer, ME 04412

Kenneth Baker, S.J.
Catholic Views Broadcast,
Inc.
86 Riverside Drive
New York, NY 10024

Michael A. Jett
Northeastern State University
Tahlequah, OK 74464-7098

Robert S. Moore
Home Town TV48
716 N. Westwood
Toledo, OH 43607

Jeremy M. Coghlan
AVN, Inc.
2827 Central Avenue
Augusta, GA 30909

Lee R. Shoblom
London Bridge Broadcasting,
2001 Industrial Blvd.
Lake Havasu City, AZ 86403

J. T. Whitlock
WLBN-WLSK
Radio Station Road
Lebanon, KY 40033

D. J. Everett
TV43
P. O. Box 4300
Hopkinsville, KY 42240

Saleem Tawil
Global Information
Technologies, Inc.
111 Congress Ave., #2530
Austin, TX 78701

James J. Popham
Association of Independent
Television Stations, Inc.
1200 18th Street, N.W.
Suite 502
Washington, D.C. 20036

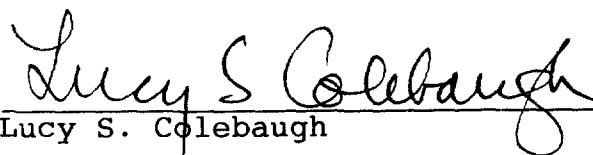
Henry L. Baumann
Jack N. Goodman
National Association of
Broadcasters
1771 N Street, N.W.
Washington, D.C. 30046

David A. Post
Channel America Television
Network, Inc.
24 West 57 Street
Suite 804
New York, NY 10019

Benjamin Perez
Abacus LPTV Investments
1801 Columbia Road, N.W.
Suite 101
Washington, D.C. 20009

Jonathan D. Blake
Gregory D. Schmidt
Covington & Burling
P. O. Box 7566
Washington, D.C. 20044
Attorneys for AMSTV

Joseph P. Benkert
Holme, Roberts & Owen
Suite 4100
1700 Lincoln
Denver, CO 80203
Attorneys for NTA


Lucy S. Colebaugh